

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

Vol. I, Pages 1-213

Exhibits 1-47

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AMRO FARID

vs.

23-cv-426-SM

TRUSTEES OF DARTMOUTH COLLEGE

\*\*\*\*\*

DEPOSITION BY ZOOM OF ALEXIS ABRAMSON, a witness called on behalf of the Plaintiff, pursuant to the Rules of Civil Procedure, before Karen D. Pomeroy, Registered Diplomate Reporter and Licensed Court Reporter (No. 71) in and for the State of New Hampshire, at 20 Ledyard Lane, Hanover, New Hampshire, on Tuesday, March 25th, 2025, commencing at 10:01 a.m.

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14  
15  
16 Also Present: Amro Farid

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12	*Denotes exhibits requested to be deemed confidential	
13		
14	The following page/line designations refer to	
15	portions of testimony requested to be deemed	
16	confidential:	
17	21/18, 39/13, 40/3, 87/4, 103/22, 116/16, 118/3,	
18	128/8, 131/14, 138/10, 182/5, 185/7, 188/14	
19		
20		
21		
22		
23		
24	Exhibits Attached	

## 1 STIPULATIONS

2 It is stipulated by and between counsel for  
3 the respective parties that the deposition  
4 transcript is to be read and signed by the  
5 deponent under the pains and penalties of  
6 perjury; and that the sealing and filing thereof  
7 are waived; and that all objections, except as to  
8 form, and motions to strike are reserved until  
9 the time of trial; and that the witness may be  
10 sworn remotely.

11 \* \* \*

12 MR. ZAHARIAS: Joe, before we start, I just  
13 want to make sure that we're agreeing on the same  
14 stipulations that we had with respect to  
15 Professor Farid's deposition.

16 MR. SULMAN: Yes. I was going to say that.

17 The parties have agreed to certain  
18 stipulations not only for Professor Farid's but  
19 for all -- well, actually, not for  
20 Professor Farid's, because that was in person  
21 actually.

22 We're going with the stipulations that we've  
23 used for all of the Zoom depositions, which is  
24 that the -- the witness will have 30 days to read

1 and sign, we'll waive the notary and agree that  
2 we'll assume that the notary is -- as if it was  
3 sworn, and we -- we agree that the witness --  
4 both parties agree that the witness can be sworn  
5 remotely and the -- and the -- we'll agree that  
6 all objections except to form and motions to  
7 strike will be reserved until the time of trial.

8 Is that agreeable?

9 MR. ZAHARIAS: Yes.

10 MR. SULMAN: Okay.

11 ALEXIS ABRAMSON,  
12 having been duly remotely sworn by the  
13 reporter, was deposed and testified as  
14 follows:

15 EXAMINATION

16 BY MR. SULMAN:

17 Q. Good morning. Can you state your name for the  
18 record.

19 A. Alexis Abramson.

20 Q. Okay. And, Ms. Abramson, where are you located  
21 right now?

22 A. In Hanover, New Hampshire.

23 Q. Okay. Are you at the -- are you at Dartmouth's  
24 location?

1 Q. Well, what I'm saying is is there a standard  
2 definition, or is what you're saying what you  
3 believe to be the generally accepted  
4 definition?

5 MR. ZAHARIAS: Objection. Form.

6 A. I don't know if there's a standard definition; so  
7 I suppose I would say it's what I believe to be  
8 a -- the definition given my experience in the  
9 field.

10 BY MR. SULMAN:

11 Q. Well, let me ask you about some examples.

12 Is an NSF EAGER grant a competitively awarded  
13 grant?

14 A. My understanding is that doesn't go through a  
15 solicitation process nor a peer review; so no.

16 Q. And why -- what is that understanding based on?

17 A. My experience as an academic for 25 years.

18 Q. Have you talked to anyone at NSF that told you  
19 that EAGER grants don't go through competitive --  
20 don't go through peer review?

21 A. Yes, I actually had an EAGER grant early on in my  
22 career. It did not go through competitive  
23 review.

24 That's my understanding that an EAGER grant

1 does not. I don't know if that's written down,  
2 but obviously I learned that somewhere along the  
3 way.

4 Q. What about NSF CAREER grant?

5 A. Yes. That's a solicitation, and it goes through  
6 a peer review; so that would be a competitively  
7 awarded grant.

8 Q. So the fact that there's a solicitation is what  
9 makes it be peer review?

10 A. There could be solicitations at some agencies  
11 that don't have peer reviews, but most of the  
12 time, yes, a solicitation also includes a peer  
13 review, which then leads to the awarding.

14 Q. I guess what I'm wondering is can't there be peer  
15 review without solicitation?

16 A. I suppose that could happen too if a program  
17 officer decided to send a proposal that didn't  
18 come through a solicitation out for review by  
19 some people.

20 I think a program officer could choose to do  
21 that.

22 Q. And do all NSF EAGER grants not have -- not go  
23 through solicitations?

24 A. I think you'd have to ask NSF for the specifics



1 around how they always or sometimes run those  
2 processes.

3 Q. So your NSF EAGER grant did not go through a  
4 solicitation?

5 A. Mine did not go through a solicitation; as far as  
6 I know, did not go through a peer review, but I'm  
7 also basing it on multitudes of conversations  
8 I've had with program officers or other faculty  
9 researchers about NSF EAGER grants.

10 Q. Okay. Were you aware that Professor Amro Farid  
11 had an NSF EAGER grant?

12 A. I did not know that, I believe, until the faculty  
13 discussion during his tenure-review case.

14 Q. Okay. And did you split -- did you -- did you do  
15 a --

16 A. Or around that time, I should say.

17 Q. Did you do an inquiry to look at whether or not  
18 there was a solicitation associated with his  
19 grant?

20 A. Sorry. Can you say that again.

21 Q. Did you do any inquiry or research to determine  
22 whether or not there was a solicitation with his  
23 EAGER grant?

24 A. So after it was brought to my attention, I looked

1       it up and noticed it was an EAGER grant. I  
2       didn't know that at the time. I thought it was a  
3       regular NSF grant. I did not investigate further  
4       to find out if there was a solicitation because I  
5       assumed there was not.

6       Q. Okay. So did you believe that that grant was not  
7       competitively funded?

8       A. That's right.

9       Q. And is it your recollection that you had this  
10      conversation with Professor Farid about the  
11      different types of funding as part of his  
12      supplemental review in 2020?

13      A. Yes.

14      Q. Okay.

15      A. I don't think we specifically touched on NSF  
16      EAGER grants, but yes.

17      Q. I've sent you Exhibit 15 in your deposition. Let  
18      me know when you have it open.

19      A. Okay.

20      Q. Okay. This is an email exchange between you and  
21      Professor Farid on June 19th, 2020.

22                Could you read it to yourself, please.

23      A. Okay. Okay.

24      Q. And you say -- you first say it's good to speak

1 Professor Farid dated February 14th, 2022.

2 I just want you to turn your attention to  
3 page 16 of the PDF. It has page 11 on the actual  
4 document on the bottom.

5 Let me know when you're there.

6 A. Okay. I'm on page 16.

7 Q. Okay. Is that your signature next to the signed  
8 and dated February 11th, 2022?

9 A. It looks like my signature.

10 Q. Okay. Do you recall signing a response to  
11 charges of discrimination brought by  
12 Professor Farid at the New Hampshire Commission  
13 for Human Rights?

14 A. I do recall this under advisement of counsel;  
15 walking through this and then signing this  
16 document.

17 Q. Okay. Thank you. Can you turn to paragraph  
18 33 -- I'm sorry. Paragraph 23, which is on page  
19 58 of the document; page 10 of the PDF.

20 A. Yes.

21 Q. Are you there?

22 A. Yes.

23 Q. Okay. This document says Respondent admits that  
24 Professor Farid discussed his tenure case with

1 Associate Dean Laura Ray and Dean Alexis Abramson  
2 in the Spring of 2020, around the end of the  
3 academic year; correct?

4 A. Yes.

5 Q. Okay. And the third sentence, can you read the  
6 third sentence, please.

7 A. Respondent denies? That sentence?

8 Q. Yes.

9 A. Respondent denies that complainant was encouraged  
10 to submit his dossier for consideration for  
11 tenure, but admits that Dean Abramson indicated  
12 that she believed that complainant had a strong  
13 tenure case during these discussions, prior to  
14 learning about weaknesses in his application that  
15 were not apparent at the time.

16 Q. Thank you. And you didn't ask anyone to make  
17 changes to that paragraph when it was written;  
18 did you?

19 MR. ZAHARIAS: Objection to the extent that  
20 the question seeks any privileged communications.

21 A. No.

22 BY MR. SULMAN:

23 Q. Okay. When -- as of July 2020, did you know that  
24 Professor Farid had two more years on his tenure

1 track?

2 A. Yes, I believe I did.

3 Q. Okay. Did you have any discussions with  
4 Professor Farid about the tenure process and what  
5 would happen if he was denied tenure?

6 A. I don't recall if I went -- I'm sure we talked  
7 about the tenure process. I don't recall the  
8 specifics.

9 Q. So just -- and I just need to -- if you don't  
10 recall, you don't recall it.

11 Can you say whether or not you advised  
12 Professor Farid that if he was denied tenure, he  
13 would enter his terminal year?

14 A. I don't recall.

15 Q. Do you know sitting here today whether Laura Ray  
16 advised Professor Farid of that fact?

17 A. You'd have to ask her.

18 Q. I just sent you Exhibit 18. Let me know when you  
19 have it.

20 A. Okay. It's open.

21 Q. Okay. Do you recognize this as Professor Farid's  
22 research statement?

23 A. I can't say that I recognize it. It's been a  
24 while since I reviewed it.

1 meetings when we talked about his research  
2 funding and the type of proposals he should be  
3 submitting and things like that; so I do recall  
4 having those conversations with him.

5 I didn't realize the specifics around like  
6 the NSF EAGER grant or what the CRREL grant  
7 really meant until, you know, this discussion in  
8 large part.

9 Q. So this discussion was the first time you  
10 realized that the CRREL grant wasn't competitive?

11 A. No, I'm not saying that. I think there were some  
12 things that were said during the discussion that  
13 helped me see it in a different way, but I'm not  
14 saying I didn't understand what it was. I did.

15 But that's the purpose of the discussion is  
16 to hear other people's views and to -- they --  
17 you know, so you're not just limited by your own.

18 So I'm just saying the discussion sort of  
19 opened up a different perspective for me.

20 Q. What specifically in this discussion opened up  
21 you to things that you did not realize before  
22 about Professor Farid's research funding?

23 A. Well, one thing the -- probably the most  
24 prominent thing was the missing EAGER label on

1 the NSF grant and how it was unfortunate that  
2 that wasn't included on his CV.

3 Q. Anything else?

4 A. I mean, I'd have to go back and reread all the  
5 minutes to see if I could jog my memory. I think  
6 it's just hard for me to remember.

7 Q. Well, you know, Exhibit 30's in front of you now;  
8 so if you want, you can take your time to read  
9 the minutes. There's three or four pages of  
10 minutes.

11 A. Okay. You'd like me to read that? Take the time  
12 to do that?

13 Q. Yeah.

14 A. Okay.

15 Q. Again, just let me know when you're done.

16 A. Okay. Can you ask the question again then.

17 Q. Yes. So what comment, if any, during the faculty  
18 discussion on Amro Farid's tenure case caused you  
19 to re-evaluate your understanding of his funding  
20 record?

21 A. So I don't know that I -- I fully re-evaluated  
22 his funding record.

23 I mean, I had -- I felt it was strong with  
24 reservations, and so that -- I think I still

1 had -- I would say the NSF EAGER, pointing that  
2 out, I do recall that being a surprise when I  
3 didn't know, and so I would say that was the most  
4 significant new piece of information.

5 I think John Zhang's comment about -- he was  
6 an NSF program manager, also kind of influenced,  
7 you know, my thoughts on -- on -- he also agreed  
8 that there should be more competitively awarded  
9 peer-reviewed kind of proposals; so I think I  
10 could just speak to that in that way in  
11 particular.

12 One thing I'll say is I guess I hadn't  
13 quantified the amount in a way that some of the  
14 faculty were presenting it.

15 Q. I'm sending you what is marked as Exhibit 32.  
16 Let me know when you have it open.

17 A. Okay. It's open.

18 Q. Exhibit 32 is a May 11th, 2021, letter from  
19 Professor Farid to yourself where he says he'd  
20 like to thank you for making use of the 2021  
21 tenure review meeting to discuss external funding  
22 over the last six years.

23 A. Hm-hmm. Yes.

24 Q. Do you recall meeting with him to discuss



1 Did you believe that he tried to conceal  
2 something?

3 A. Well, that was part of the faculty discussion was  
4 around the fact that why didn't he include it on  
5 his CV was the question.

6 Q. Well, you say "it." What is the "it" you're  
7 saying --

8 A. The word EAGER.

9 Q. And why is that word EAGER significant?

10 A. Because most people who are familiar with NSF  
11 funding would know that an EAGER grant is not  
12 competitively awarded.

13 Q. So it's your -- it's your belief that, as a  
14 general matter of practice, NSF EAGER grants are  
15 not competitively awarded?

16 A. That's correct.

17 MR. ZAHARIAS: Objection.

18 BY MR. SULMAN:

19 Q. Okay. Okay. In the third paragraph here that  
20 begins Beyond the CRREL funding, he writes here  
21 Beyond the CRREL funding, I have shown -- I have  
22 also shown an ability to compete head to head  
23 with peers and win. For example, my project  
24 entitled "SSDIM: Synthetic and Simulated Data